

# **EXHIBIT A**

## Jack R. Wilson

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**From:** Scott Flanz  
**Sent:** Tuesday, April 2, 2024 3:30 PM  
**To:** Ligotti, Andy; IDG.Lenovo.ITC; Dienes, Jennifer  
**Cc:** [Service] Lenovo-InterDigital ITC  
**Subject:** RE: Inv. No. 337-TA-1373 - Submission of Additional Evidence re Claim Construction

Counsel:

Per your request, below are citations to the testimony and documents that we intend to provide to the ALJ.

1. Bordes Dep. Tr. (Rough) at 190:16–193:19
2. Yin Dep. Tr. (Rough) at 46:08–19, 49:12–24, 54:20–55:03, 60:25–62:19, 69:05–13, 71:05–72:05, 74:18–23, 80:03–16, 86:02–14, 87:18–21, 89:22–90:06, 91:12–92:10, 140:23–141:05, Exs. 3–5; Yin et al., *A Direction-Adaptive In-Loop Deartifacting Filter for Video Coding*, 2008 15th IEEE International Conference on Image Processing (2008).

We intend to submit this tomorrow.

Sincerely,  
Scott Flanz

**Scott M. Flanz**  
Principal  
**Fish & Richardson P.C.**  
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**From:** Ligotti, Andy <Andy.Ligotti@alston.com>  
**Sent:** Wednesday, March 27, 2024 12:05 PM  
**To:** Scott Flanz <flanz@fr.com>; IDG.Lenovo.ITC <IDG.Lenovo.ITC@alston.com>; Dienes, Jennifer <Jennifer.Dienes@usitc.gov>  
**Cc:** [Service] Lenovo-InterDigital ITC <ServiceLenovo-InterDigitalITC@fr.com>  
**Subject:** RE: Inv. No. 337-TA-1373 - Submission of Additional Evidence re Claim Construction

[This email originated outside of F&R.]

Scott,

During the March 25 DCM you did not identify testimony from Philippe Bordes as part of the filing Respondents were considering. So that we can consider your new proposal, please identify the “relevant portions of depositions” that you intend to submit. Similarly with respect to Dr. Yin’s testimony, as we indicated on the DCM, please identify the portions of the transcript and the articles that you intend to submit so that we can consider your proposed filing to the ALJ.

Thank you,

Andy

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**From:** Scott Flanz <[flanz@fr.com](mailto:flanz@fr.com)>  
**Sent:** Tuesday, March 26, 2024 7:29 PM  
**To:** IDG.Lenovo.ITC <[IDG.Lenovo.ITC@alston.com](mailto:IDG.Lenovo.ITC@alston.com)>; Dienes, Jennifer <[Jennifer.Dienes@usitc.gov](mailto:Jennifer.Dienes@usitc.gov)>  
**Cc:** [Service] Lenovo-InterDigital ITC <[ServiceLenovo-InterDigitalITC@fr.com](mailto:ServiceLenovo-InterDigitalITC@fr.com)>  
**Subject:** Inv. No. 337-TA-1373 - Submission of Additional Evidence re Claim Construction

**EXTERNAL SENDER – Proceed with caution**

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Counsel:

Further to our discussion yesterday on the DCM, Respondents intend to submit a short filing to the ALJ, identifying additional factual evidence adduced during discovery that is relevant to the claim construction of (i) the means-plus-function terms of the '859 patent and (ii) the sparse denoising filter term for the '556 patent. With respect to the former, Phillippe Bordes testified that there are thousands of ways to perform decoding, contradicting InterDigital's position that the claim terms denote a particular, known structure. With respect to the latter, Peng Yin testified that she wrote articles on the subject of sparse denoising filters, and that those articles describe sparse denoising filters as performing three steps: transform, threshold, and inverse transform—supporting Respondents construction. The supplement will identify these relevant portions of deposition for the ALJ and also identify the articles about which Ms. Yin testified.

Respondents understand that InterDigital opposes this submission. Please confirm InterDigital's opposition by COB tomorrow.

Sincerely,  
Scott Flanz

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